

217/782-2113

CONSTRUCTION PERMIT

PERMITTEE

Bagcraft Packaging, L.L.C.  
Attn: Michael J. Laing  
3900 West 43<sup>rd</sup> Street  
Chicago, Illinois

# Draft

Application No.: 04120035

I.D. No.: 031600ACL

Applicant's Designation:

Date Received: December 15, 2004

Subject: New Flexographic Printing Press

Date Issued: ---

Location: 3900 West 43<sup>rd</sup> Street, Chicago

Permit is hereby granted to the above-designated Permittee to CONSTRUCT emission source(s) and/or air pollution control equipment consisting of a new flexographic printing press as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1.0 UNIT SPECIFIC CONDITIONS

1.1 Flexographic Printing Line

1.1.1 Description

The new printing line will be a 10-color central impression flexographic line with a natural gas dryer. The new printing line will be used to print a variety of substrates i.e. paper, plastic films, etc.

1.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
001	Flexographic Printing Line	None

1.1.3 Applicability Provisions and Applicable Regulations

- a. The "affected line" for the purpose of these unit specific conditions is the flexographic printing line described in Condition 1.1.1 and 1.1.2.
- b. The affected line is subject to 35 IAC 218.401, Flexographic Printing, which provides that:
  - i. The Permittee shall only use inks or coatings that have a volatile organic material (VOM) content of 25 percent or less VOM by volume of

the volatile content in the ink and coating,  
or

- ii. The Permittee shall only use inks or coatings, that have a VOM content of 25 percent or less VOM by volume of the volatile content in the ink and coating on a daily weighted average basis, or
- c. The affected line is subject to 35 IAC 212.321(a), which requires that: no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].

#### 1.1.4 Nonapplicable Regulations

- a. Construction of the affected line is not considered a modification subject to 35 IAC Part 203, Major Stationary Sources Construction and Modification (MSSCAM) because the net emissions of VOM from the affected line and any other contemporaneous changes would be less than 25 tons per year. (See Attachment A).
- b. The affected line is not subject to 35 IAC 218.301, Use of Organic Material, because the affected line is subject to 218.401 for Printing and Publishing Operations.

#### 1.1.5 Operational Limitations

- a. At all times, the Permittee shall, to the extent practicable, maintain and operate the affected line, in a manner consistent with good air pollution control practice for minimizing emissions.
- b. Total amount of ink usage in the affected line shall not exceed 52 tons/month and 313 tons/year.

#### 1.1.6 Emission Limitations

- a. Total emissions from the affected line shall not exceed 2.12 tons/month and 12.75 tons/year.
- b. Compliance with annual limits shall be determined from a running total of 12 months of data.

1.1.7 Testing Requirements

- a. Upon request by the Illinois EPA, the VOM content of inks, coatings and/or cleaning solutions used on affected line shall be determined according to USEPA Reference Method 24 of 40 CFR 60 Appendix A, pursuant to 35 IAC 218.105.
- b. If the Permittee intends to take credit for VOM containing waste shipped off-site, then the percent concentration of solvent in the VOM containing waste from the affected line shall be determined according to USEPA Test Methods for Evaluation of Solid Waste, Physical/Chemical Methods (SW-846), Test Method 8260.

1.1.8 Monitoring Requirements

None

#### 1.1.9 Recordkeeping Requirements

The Permittee shall maintain records of the following for the affected line:

- a. The name and identification of each coating and ink [35 IAC 218.404(c) (2) (A)].
- b. The VOM content of each coating and ink [35 IAC 218.404(c) (2) (B)].
- c. The collective daily amounts of inks used for the affected line in pounds.
- d. Monthly ink and coating usage in pounds for the affected line.
- e. The daily-weighted average VOM content of all coatings and inks as applied per printing line, where applicable [35 IAC 218.404(d) (2)].
- f. The VOM content of VOM containing waste sent off-site as determined by Condition 1.1.7(c), if applicable.
- g. Total VOM emissions from the affected line calculated in accordance with the procedures given in Condition 1.1.12(b), on a monthly and annual basis in terms of pounds per month and tons per year.

#### 1.1.10 Reporting Requirements

- a. The Permittee shall notify the Illinois EPA of noncompliance of an affected line with the permit requirements within 30 days of the violation. Reports shall describe the probable cause of such deviations and any corrective actions or preventive measures taken.
- b. At least 30 calendar days before changing the method of compliance with 35 IAC 218.401 to a different option of 35 IAC 218.401 not already listed in the permit, the Permittee shall certify compliance for such new methods in accordance with the requirements of the certification reports of Condition 9.8 of the CAAPP Permit and perform all tests and calculations necessary to demonstrate that such printing line(s) will be in compliance with the applicable requirements of 35 IAC 218.407 and the requirements of this permit [35 IAC 218.404(c) (3) (B)].

1.1.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

1.1.12 Compliance Procedures

Compliance with emission limits shall be determined using the formulas listed below:

$$\text{VOM emissions} = \frac{\text{VOM containing material usage}}{\text{x VOM content}}$$

Please note that the Permittee may operate the affected line under this Construction Permit until the next reopening of the CAAPP permit.

Ricardo Ng

RNG

**Attachment A**

NSR Applicability

Contemporaneous Time Period of 2001 through 2005 in tons/year

Table I: Emissions Increase Associated with the project

<u>Equipment</u>	<u>Date</u>	<u>Permit Number</u>	<u>VOM Increase</u>
Line 001	2005	04120035	12.75

Table II: Source-Wide Creditable Contemporaneous Emission Increases

<u>Equipment</u>	<u>Date</u>	<u>Permit Number</u>	<u>VOM Increase</u>
Line 003	2003	03080060	4.8
Line 170 and 171	2002	02070041	1.63
Line 135	2001	00110076	1.63

Table III: Net Emissions Change

	<u>VOM Emissions</u>
Emissions Increases Associated with New Construction	12.75
Source-Wide Creditable Contemporaneous Emissions Increases	8.06
Source-Wide Creditable Contemporaneous Emission Decreases	<u>-0.00</u>
TOTAL	20.81

RNG:psj